

IN THE LAW COURT FOR SULLIVAN COUNTY
AT BRISTOL, TENNESSEE

FILED

DODD POWELL KING }
Plaintiff, } 2009 OCT 23 P 2:33
v. }
ALLSTATE } Civil Action No. 09-2694
Defendant. } (C)

COMPLAINT

COMES NOW the Plaintiff, Dodd Powell King, a citizen and resident of Sullivan County Tennessee, and sues the defendants named above jointly and severely, and for her cause of action says:

1. Plaintiff is citizen and resident of Sullivan County.
2. Defendant is a domestically related insurance company licensed to do business in Tennessee at all times pertinent hereto.
3. Dodd Powell King owned certain property on 289 Old Thomas Bridge Road, Bluff City , Tennessee.
4. That Plaintiff had a policy with Allstate the covered personal property as well as the reality. The Allstate Insurance Company Deluxe Homeowners Policy number is 063923814

07/30.

The Slaughter Law Firm
Frank L. Slaughter, Jr.
324 6th Street
Bristol, Tennessee 37620
423-844-0660

5. That on or about May 12, 2008 the realty and personal property therein and thereon sustained significant fire damage.
6. That Plaintiff has cooperated at all times pertinent hereto .
7. That Cheryl and Dodd King were going through a divorce and did not reside in the same house at all times pertinent hereto.
8. That Dodd King has complied with all conditions precedent to this insurance policy.
9. Dodd King has been without the money and without prejudgment interest on said monies
10. Dodd King ask that he be the beneficiary of the policy as he has complied without any fault.
11. Allstate has wrongfully and intentionally withheld monies due Dodd Powell King.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays for

Judgment as follows:

1. That this Complaint be filed and served upon the Defendant through the Commissioner of Insurance.
2. That Plaintiff is awarded judgment against Defendant for the full amount of the policy monies on both the personal property and the realty .
3. That Plaintiff is awarded judgment against Defendant for the prejudgment interest on said monies.
4. Plaintiff is awarded judgment of twenty -five percent (25%) bad

The Slaughter Law Firm
Frank L. Slaughter, Jr.
324 6th Street
Bristol, Tennessee 37620
423-844-0560

faith claim and in addition thereto.

5. That Plaintiff be awarded other relief as is just and equitable under the circumstances.

Respectfully submitted,
Dodd Powell King

By:


Frank L. Slaughter, Jr.
Attorney for Dodd Powell King
BPR No. 18893
324 6th Street
Bristol, Tennessee 37620
(423) 844-0560

COST BOND

I, the undersigned, do hereby acknowledge myself as surety in this cause for costs.


Frank L. Slaughter, Jr.

The Slaughter Law Firm
Frank L. Slaughter, Jr.
324 6th Street
Bristol, Tennessee 37620
(423) 844-0560

2009 OCT 27 PM 5:04
Circuit Court Clerk
Frank L. Slaughter, Jr.